

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST, INC.'S OPPOSITION TO MICRON DEFENDANTS' MOTION TO
STRIKE EXPERT REPORT OF DR. MANGIONE-SMITH (DKT. 369)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. ("Netlist") in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.'s Opposition to Micron Defendants' Motion to Strike Expert Report of Dr. Mangione-Smith (Dkt. 369). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of a Micron data sheet titled [REDACTED] [REDACTED] dated November 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of JEDEC Standard JESD79-4C (Revision of JESD79-4B, June 2017) regarding DDR4 SDRAM, dated January 2020.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the Expert Report of Dr. Harold Stone Regarding Issues Related to and Non-Infringement of Plaintiff's U.S. Patent Nos. 7,619,912 and 11,093,417, dated December 21, 2023, bearing Bates numbers beginning SAM-NET00332011.

5. Attached as **Exhibit 4** is a true and correct copy of Exhibit I, Summary of Technical Damages Issues, to the Opening Expert Report of Dr. William Henry Mangione-Smith, taken in Civil Case No. 22-CV-293-JRG, dated November 20, 2023.

6. Attached as **Exhibit 5** is a true and correct copy of Exhibit F to the Opening Expert Report of Dr. Mangione-Smith in Netlist, Inc. v. Micron Technology, Inc. et al., no. 2:22-cv-203, dated October 4, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of a Micron data sheet titled [REDACTED]

[REDACTED], dated September 2021, used as Exhibit 1 to the November 17, 2023 deposition of Scott Smith.

8. Attached as **Exhibit 7** is a true and correct copy of Exhibit B to the Rebuttal Expert Report of Dr. William Henry Mangione-Smith, dated December 21, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024, in the Marshall, Texas.

By */s/ Jason G. Sheasby*

Jason G. Sheasby